

# **Olympic Region Environmental Compliance Plan**

---

## **Introduction**

WSDOT's statewide environmental permit compliance strategy directs regions to develop specific environmental compliance plans. Olympic Region endorses this environmental compliance plan to ensure Region projects are designed, constructed and maintained in accordance with environmental commitments made through the environmental documentation and permitting process. This plan has been developed for construction projects only. It is the intent of the Region to seek environmentally responsible permits and consistently deliver projects in an environmentally responsible manner.

## **Purpose**

The purpose of this environmental compliance plan is to have an effective strategy in place to reduce incidents of environmental documentation and permit noncompliance. The environmental staff will work together with design and construction personnel proactively to identify potential issues early, taking positive action before violations occur.

## **Goals**

The goals of this environmental compliance plan are to:

- Improve and maintain a high level of permit compliance on all projects.
- Anticipate situations that could result in non-compliance events and implement preventative solutions.
- Have no permit violations that result in fines from resource agencies.
- Continue to reduce the severity of permit violations each year.
- Eliminate non-compliance situations that can be avoided
- Minimize impacts caused by unavoidable non-compliance situations.
- Assess how effectively we are addressing non-compliance incidents.
- Create and implement tools that clearly communicate WSDOT's compliance responsibilities.
- Learn from our mistakes and update the plan to reflect our new understanding.
- Provide support and training.

## **Training and Awareness**

The Region supports environmental training for design engineers and construction inspectors. It is the intent of both the Region Project Development and Construction

offices to provide training related to environmental compliance for project design and inspection staff as it currently exists and becomes further available.

The Training Plan will include but is not limited to:

- Environmental Compliance Training – (being developed by Headquarters)
- Environmental Permitting for Design Engineers– Provide this training developed by Olympic Region to all design engineers.
- TESC Certification – Ensure that everyone who writes, implements or works with erosion control has a current Temporary Erosion and Sediment Control (TESC) Certification.
- Spill Plan Reviewer Training
- Water Quality Sampling and Reporting
- Wetlands Recognition, Regulation, Resource Value
- Compliance Plan Implementation- Train those who will be directly responsible for environmental compliance during construction on how to use and implement this plan.
- Updates on new or changing regulations

Awareness programs could include:

- Including the bookmark and poster idea (being developed by HQ)
- Adding environmental compliance topics to safety meeting discussions
- Offer to do brownbag lunch presentations

## **Environmental Documentation and Permit Compliance**

To ensure Region projects are developed and constructed with appropriate consideration of environmental documentation commitments and permit conditions, Region staff will coordinate in the following:

### ***Preliminary Design Phase:***

Initial Project Review: EHS Office will coordinate an initial project environmental review at the time Scoping information is submitted. This project review process will vary from project to project depending upon individual needs, but generally should involve a detailed field review focusing upon potential project impacts, critical design elements, avoidance/minimization/mitigation options as well as stormwater treatment facilities. Participants should include project design, construction, maintenance and EHS office staff.

### ***Design Phase:***

Plans, Specifications and Estimate Development: Project Development and EHS will work collaboratively with the Design and Construction Offices to ensure that all environmental permit provisions are adequately incorporated into PS&E's prior to

conducting Region review. All permit conditions will be incorporated into contract provisions and copies of all permits will be included in contracts. EHS Office will coordinate a meeting with project design staff to review and incorporate environmental documentation and permit conditions and commitments into contract special provisions.

Constructability Review: Project Development will ensure that a constructability review for all work covered by environmental documentation and permits have been completed prior to finalizing the PS&E. At a minimum representatives from the EHS, Design, maintenance, and Construction Offices must participate in this review.

Commitment Tracking: Use tracking system to record all environmental commitments.

### ***Construction Phase:***

Environmental Binder: EHS Office will provide an environmental binder for each construction contract. This binder will include both standardized information relating to contact information, monitoring and reporting procedures as well as project specific requirements. Specific chain of communication and authority for contract changes requiring environmental input will be specified. The binders will include but are not limited to the following information:

- Contact numbers for agency personnel
- WSDOT environmental and resource agency contacts
- Emergency contacts
- Permits and summary conditions
- Non-compliance notification triggers and notification requirements
- Water Quality Sampling and Reporting, if required for project per permit conditions or Highway Runoff Manual

Environmental On-Call: The EHS Office will designate a staff member, as a single point of contact, to support each construction project. This staff member will be familiar with the project and associated permits and approvals. This staff member will provide assistance with interpretation of environmental permits and approvals and be able to answer general questions regarding environmental permits and commitments. This staff member will conduct a minimum of one environmental compliance field review for each construction contract. This compliance review will provide project staff with constructive support to identify and implement compliance needs as appropriate. For emergency incidents including hazardous spills please continue to follow the procedures in IL-4055.02 and IM 00-10

High Visibility Construction Fencing: Project Development will implement high visibility construction fencing in accordance with PD Memo 04-04.

Project Construction Office Environmental Compliance Staff: The Assistant Region Administrator for Construction will ensure each construction project office has staff responsible for environmental permit compliance on each project. When appropriate for projects with substantial environmental risk, the project office will designate a staff member to be dedicated to environmental permit compliance.

Pre-Construction Meetings: EHS Office will participate in all pre-construction meetings and when appropriate for projects with substantial environmental risk initiate a dedicated environmental pre-construction meeting. Additionally, EHS Office will support project construction offices for task specific site review meetings for critical construction elements.

Construction Close-out: Document that all commitments have been met upon completion of the project, and that Maintenance and Operations have received and understand all long-term compliance commitments for the project.

## **Tracking and Reporting**

Tracking Success: Tracking and documenting the success of our compliance will help us assess the effectiveness of the program, provide us with information to help make improvements and increase our credibility with the resource agencies. It is not the number of non-compliance incidents, but how well we respond to each incident that defines our compliance success.

Reporting Non-compliance Incidents: In accordance with the Construction Manual and IL 4055.02 Region Environmental and Hydraulic Services Office will track and report environmental non-compliance events. The goal is to report all non-compliance incidents regardless of severity. It is the responsibility of each Project Engineer to report each non-compliance event. It is the responsibility of the EHS Office to maintain detailed records of non-compliance events and report to Headquarters Environmental Services Office on an annual basis. Additionally, the EHS Office will coordinate an annual Region review meeting with Region Construction and Project Development Offices to review non-compliance events.